

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH DAKOTA

In re:	)	Bankr. No. 10-10146
	)	Chapter 11
	)	
VEBLEN EAST DAIRY LIMITED	)	HANUL PROFESSIONAL LAW
PARTNERSHIP	)	CORPORATION, ET AL.'S RESPONSE
Tax ID/EIN 20-8870979,	)	TO DEBTOR'S MOTION FOR
	)	AUTHORITY TO USE CASH
	)	COLLATERAL AND REQUEST FOR
	)	PRELIMINARY HEARING
	)	
	)	
Debtor.	)	

COMES NOW HANUL PROFESSIONAL LAW CORPORATION, A/K/A HANUL LAW OFFICE ("Hanul") and the 32 limited partners as set forth on Attachment A ("Limited Partners") of Veblen East Dairy Limited Partnership, the Debtor herein, by and through their attorneys, Jeff Sveen of Siegel, Barnett & Schutz, L.L.P. of Aberdeen, South Dakota, and Vance R.C. Goldammer, Terry N. Prendergast, and Paul V. Goldammer of Murphy, Goldammer & Prendergast, LLP of Sioux Falls, South Dakota, and respectfully object to the Motion for Authority to Use Cash Collateral and in support thereof state and allege as follows:

1. The Debtor filed a voluntary Chapter 11 Petition in bankruptcy on or about July 2, 2010. Such Petition has recently come to the attention of the Limited Partners and Hanul, and an investigation is being done as to the authority to so file.

2. This matter arises under the jurisdictional provisions of 28 U.S.C. § 157 and 1334 11 U.S.C. § 363(c) and Bankruptcy Rules of Procedure 5005 and 4001(b).

3. Hanul and Limited Partners respectfully resist said Motion on a protective basis for reasons specifically including, but not limited to the authority of the Debtor to file this bankruptcy. Hanul and Limited Partners object for all of the reasons as set for in the Joinder of Hanul in the Motion of AgStar Financial Services, PCA and AgStar Financial Services, FLCA to excuse compliance with 11 U.S.C. § 543(a), (b) and (c).

4. Hanul was recently informed of this bankruptcy Petition and Hanul notified the Debtor that it was taking control of the voting powers and ownership rights of the general partnership interests prior to the Petition date. The general partner did not have authority to execute the bankruptcy Petition and therefore does not have authority to continue to operate the Debtor post-filing.

5. Hanul is concerned with the authorizations filed by the Debtor and the employment of the professional persons without authority as set forth in the Joinder.

WHEREFORE, the Limited Partners and Hanul object to the Debtor's Motion to use Cash Collateral.

Dated this 12th day of July, 2010.

/s/ Terry N. Prendergast

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*Attorneys for Hanul Professional Law  
Corporation, et al.*

**ATTACHMENT A**

Hanul Professional Law Corporation, a/k/a Hanul Law Office; and

32 Limited Partners of Veblen East Dairy Limited Partnership, namely:

Yong Jin Huh  
Jang Woo Cho  
Seung Hee Chang  
Jae Keun Park  
Ye Na Choi (Kang)  
Mi Hye Kim (So)  
Sung Tae Kim  
Young Bo Kim  
Kyung Min Lee  
Sung Jun Moon  
Young Jin Lee  
Jung Sook Park  
Greena Cha  
Sung Hee Lim  
Sun Kyung Lee  
Hoon Sup Oh  
Hee Sun Kim  
Sun Kap Lee  
Won Jae Kim  
Jong Soo Lee  
Yong Ho Kim  
Young Hee Park  
Sungtae Kim  
Jee Hyun Kim  
Eunjoo Sohn  
Taemoo Kim  
Sinyong Moon  
Ja Ryoung Chung  
Heejun Lee  
Ok Heui Kim  
Cheyeon Lee  
Yun Kyung Cho